



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 31 2011

REPLY TO THE ATTENTION OF:

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Eric Dippon, Manager
LandComp Corporation
13832 South Kostner
Crestwood, Illinois 60445

Re: LandComp Corporation - Ottawa, Illinois
Administrative Order EPA-5-11-113(a)-IL-03

Dear Mr. Dippon:

Enclosed is an executed original of the Administrative Order regarding the
above captioned case. If you have any questions about the Order, please contact me at
312-886-6812.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent Marable", is written over a horizontal line.

Brent Marable
Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure: Administrative Order EPA-5-11-113(a)-IL-03

cc: Ray Pilapil, Manager
Bureau of Air – Compliance and Enforcement Section
Illinois Environmental Protection Agency

Standard bcc's: Official file copy w/attachment(s)

Other bcc's: Cynthia King, C-14J

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-11-113(a)-IL-03
)	
LandComp Corporation)	Proceeding Under Section 113(a)(1)
Ottawa, Illinois)	of the Clean Air Act, 42 U.S.C. § 7413(a)(1)
)	
)	
)	

Administrative Order

1. The Director of the Air and Radiation Division, United States Environmental Protection Agency (U.S. EPA), Region 5, is issuing this Order to LandComp Corporation (LandComp) under Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1).

Statutory and Regulatory Background

2. Each state must submit to the Administrator of U.S. EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the Act, 42 U.S.C. § 7410.
3. On February 21, 1980, 45 Fed. Reg. 11472, U.S. EPA approved 35 Illinois Administrative Code (IAC) § 214.301, as part of the federally enforceable State Implementation Plan (SIP) for Illinois.
4. 35 IAC § 214.301 states that "no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except for processes designed to remove sulfur compounds from the flue gases of fuel combustion emission sources."
5. Under Section 113(a)(1) of the Act, 42 U.S.C. § 7413(a)(1), the Administrator of U.S. EPA may issue an order requiring compliance to any person who has violated or is

violating a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

6. LandComp owns and operates a municipal solid waste landfill at 2840 East 13th Road, Ottawa, Illinois (the Facility).
7. At the facility, LandComp combusts the landfill gas that it collects in a utility gas combustion flare.
8. The utility flare at the LandComp facility is subject to 35 IAC § 214.301 of the Illinois SIP.
9. To date there is no evidence that the LandComp facility exceeded the limitation in 35 IAC § 214.301.
10. LandComp's Title V operating permit does not include the requirements of 35 IAC § 214.301.
11. The failure to include the requirements of 35 IAC § 214.301 in LandComp's Title V operating permit is a violation of the Section 110 of the Act, 42 U.S.C. § 7410.
12. LandComp does not admit nor deny the factual allegations in this Order.

Compliance Program

13. Within one year of the effective date of this Order, LandComp must submit a request to the Illinois Environmental Protection Agency for a revision to its Title V operating permit to include 35 IAC § 214.301.
14. The requested Title V operating permit application must include the following terms:

Landfill Gas Sampling

For each landfill gas sampling and analysis event, at least three samples of landfill gas will be taken from the header prior to the flare. The samples are to be taken consecutively, and shipped to a laboratory expeditiously. If any problems occur with the sample collection, shipping, or analysis, which preclude determination of valid data, then new testing runs should be performed as quickly as possible.

Landfill Gas Analysis

The samples will be analyzed using ASTM 5504 or an approved alternate test method. The three samples shall be arithmetically averaged together to produce an average total reduced sulfur (TRS) concentration of the landfill gas being combusted. This value will determine the frequency of future monitoring events, as stated below:

Less than 750 ppmv TRS - Annual
751 - 2,000 ppmv - Quarterly
2,001 - 6,000 ppmv - Monthly
Above 6,000 ppmv - Weekly

After five consecutive periods with an average TRS concentration lower than the current sampling and analysis regime, which time period may include data collected before the date of this Order, sampling and analysis can be reduced to the next lowest frequency interval.

Compliance with 35 IAC § 214.301 can be determined by collecting a total sulfur content before the control device and using stoichiometric principles to convert the total sulfur to a sulfur dioxide concentration. Based on typical landfill gas properties a 2000 ppm standard would have an inlet total sulfur content of 11,540 ppm for compliance. If inlet sulfur concentrations at the control device exceed 10,000 ppm then additional documentation is required with the Annual Emission Report to demonstrate compliance with 35 IAC § 214.301.

15. Within 30 days of submitting its revised Title V permit application and/or request for modification to the Illinois Environmental Protection Agency, LandComp must provide a copy of the application and/or modification to U.S. EPA.

16. LandComp must send all notices and reports required by this Order to:

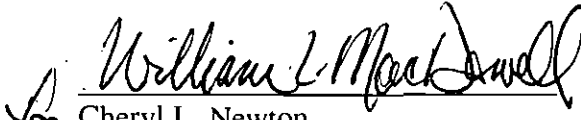
Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

General Provisions

17. This Order does not affect LandComp's responsibility to comply with other federal, state, and local laws.
18. This Order does not restrict U.S. EPA's authority to enforce the Illinois SIP or any other section of the Act.
19. Nothing in this Order limits the U.S. EPA's authority to seek appropriate relief, including penalties, under Section 113 of the Act, 42 U.S.C. § 7413, for LandComp's violation of the SIP.
20. Failure to comply with this Order may subject LandComp to penalties of up to \$37,500 per day for each violation under Section 113 of the Act, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.
21. The terms of this Order are binding on LandComp, its assignees and successors. LandComp must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to U.S. EPA, at the above address, that it has given the notice.
22. U.S. EPA may use any information submitted under this Order in an administrative, civil, judicial, or criminal action.
23. This Order is effective on the date of signature by the Director of the Air and Radiation Division.

24. This Order will terminate one year from the effective date, provided that LandComp has complied with all terms of the Order throughout its duration.

3/31/11
Date


Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING


I, Betty Williams, certify that I sent the executed Administrative Order, EPA Order No. EPA-5-11-113(a)-IL-03, by Certified Mail, Return Receipt Requested, to:

Eric Dippon, Manager
LandComp Corporation
13832 South Kostner
Crestwood, Illinois 60445

I also certify that I sent a copy of the executed Administrative Order, EPA Order No. EPA-5-11-113(a)-IL-03, by First Class Mail to:

Ray Pilapil, Manager
Bureau of Air-Compliance and Enforcement Section
Illinois Environmental Protection Agency
Springfield, Illinois

on the 1st day of April 2011.


Betty Williams,
Administrative Program Assistant
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7009168000007670244